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January 22, 2021

**BY ECF**

Hon. Roslynn R. Mauskopf  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Ortiz v. Red Hook Deli and Grocery 2015 Corp, et al  
**Case: 17-cv-7095**

Dear Judge Mauskopf:

Your Honor will recall that my firm represented the plaintiff Ortiz in the above referenced matter. We recently were advised by the client that the dates of employment set for the Complaint are somewhat inaccurate. In fact, the dates of employment as now provided to my firm are April 2016 until on or about June 6, 2017. As the Court will see from the pleadings in the case, the inaccuracy would reduce the default judgement to \$38,180.31<sup>1</sup>. This letter is made pursuant to Rule 3.3 of the New York Rules of Professional Conduct, which are applicable to my firm pursuant to Local Rule 1.5(b)(5).

We thank The Court for its attention to this matter.

Respectfully Submitted,

/s/Michael Faillace, Esq.

Michael Faillace, Esq.

MICHAEL FAILLACE & ASSOCIATES, P.C.

*Attorneys for Plaintiffs*

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<sup>1</sup> This figure includes interest up to January 22, 2021.